

Remarks

As stated above, the applicants appreciate the examiner's thorough examination of the subject application and request reexamination and reconsideration of the subject application in view of the preceding amendments and the following remarks.

In response to the Examiner's objection concerning the drawings submitted on 18 September 2000, applicants submit herewith 24 sheets of formal drawings.

Concerning Items 2-5 of the subject action, the Examiner rejects claims 23-24, under 35 USC §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that the applicant regards as the invention. In response to the rejection, the applicants have amended claims 23-24 to address the antecedent basis issues raised by the Examiner.

Concerning Items 6-8 of the subject action, the Examiner rejects claims 1, 2, 4, 8-14, 16 and 19-25, under 35 USC §102(e), based on the teachings of Challenger et al. (i.e., U.S. Patent No. 6,026,413; hereinafter Challenger).

Applicants claim (in currently amended claim 1):

A method of updating one or more target website data content items, comprising:
(a) providing one or more links, each of which associates one or more target content items with one or more original content items; (b) storing the links in a data storage device; and accessing the links in the storage device, and (c) updating the target data content items according to the links; (d) wherein updating the target data content further includes initiating workflow to update the target data content.

Applicants claim (in currently amended claim 13):

A system for updating one or more target website data content items, comprising:
(a) one or more links, each of which associates one or more of the target content items with one or more original data content items; (b) a data storage device for storing the links; and (c) a processor for accessing the links in the storage, and updating the target data content items according to the links; (d) wherein the processor further initiates workflow to update the target data items according to the links.

Applicants respectfully assert that Challenger fails to disclose: element (d) of applicants' claim 1, namely "wherein updating the target data content further includes initiating workflow to

update the target data content”; or element (d) of applicants’ claim 13, namely “wherein the processor further initiates workflow to update the target data items according to the links”.

Accordingly, applicants respectfully assert that Challenger is not a proper basis for a 35 USC §102(e) rejection, as the reference fails to disclose each and every element of the applicants’ claimed invention.

Generally, the applicants use of the word “workflow” concerns a systematic process for ensuring that all the manual and program (i.e., computer-controlled) steps required between content creation and final launch of one or more content objects are carried out in order, while allowing for flexibility along the way to ensure that the end result is as desired.

Workflows are beneficial in that they automate the process of content creation, review, update, and translation, allowing for the consistent enforcement of rules (e.g., “all content must be reviewed by an administrator”), and the organization and integration of the work product generated by multiple users.

Concerning the “workflow” claimed by the applicants, the applicants’ specification discloses that:

“Workflow” is a systematic process for ensuring that all the steps required between content creation and final launch of one or more Web site content objects are carried out in order, while allowing for flexibility along the way to ensure that the end result is as desired. In this embodiment, workflow includes a sequence of tasks that are required to be performed in order. Generally, many such sequences progress in parallel at the same time, one for each content item.

Each content item has associated workflow information. In this embodiment, the workflow information (designated “workflow”) is a linear series of tasks to be performed on a content item. There are no divergent workflow paths (“branches”); at any one time only one task is open for a content item. In one embodiment, there is no mechanism for moving backwards in the workflow sequence; the only related option is to reset the workflow for the item, which starts the workflow process over from the beginning. Alternatively, and in the preferred embodiment, the user may modify the workflow midway through the workflow. For example, when completing a task, a user may opt not to send the item directly to the next step but may instead send it back to the previous step for additional review.

In this embodiment, each task is either a user task or a program task. A user task is assigned to one or more users or groups. A program task is an automated part of the workflow process, for example, an HTML syntax checking program or a

program which copies content from a development server to a production server. Only one user can actually start a user task and perform the action it requires. Once a person assigned to a task officially starts it, no other users may start the task (though they may, of course, work on it unofficially). *See applicants' specification, page 16, lines 4-24.*

The Examiner fails to cite the specific passage within Challenger that was relied upon to disclose element (d) of applicants' claim 1 and claim 13, and a review of the Challenger reference fails to disclose any relevant passage(s).

Accordingly, applicants respectfully assert that Challenger is not a proper basis for a 35 USC §102(e) rejection, as the reference fails to disclose each and every element of the applicants' claim 1 and claim 13. Therefore, the applicants respectfully assert that independent claims 1 and 13 are patentable over the cited reference. Further, as defendant claims 2-3 and 5-12 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 1), the applicants respectfully assert that claims 2-3 and 5-12 are also patentable over the cited reference. Additionally, as defendant claims 14-15 and 17-25 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 13), the applicants respectfully assert that claims 14-15 and 17-25 are also patentable over the cited reference.

Concerning Items 9-10 of the subject action, the Examiner rejects claims 1, 2, 4, 9-14, 16 and 19-25, under 35 USC §102(b), based on the teachings of Allen et al. (i.e., U.S. Patent No. 5,675,802; hereinafter Allen).

Applicants respectfully assert that Allen fails to disclose: element (d) of applicants' claim 1, namely "wherein updating the target data content further includes initiating workflow to update the target data content"; or element (d) of applicants' claim 13, namely "wherein the processor further initiates workflow to update the target data items according to the links".

As stated above, the applicants use of the word "workflow" concerns a systematic process for ensuring that all the manual and program (i.e., computer-controlled) steps required between content creation and final launch of one or more content objects are carried out in order, while allowing for flexibility along the way to ensure that the end result is as desired.

The "exchanger" described in Allen and relied upon by the Examiner (*See Allen, Column 9, lines 25-46*) is quite different from the "workflow" described in the applicants' specification (*See generally, the applicants' specification, page 16, line 4 – page 17, line 6, and page 43, line*

5 – page 44, line 2). In the applicants' system, a workflow stores a series of tasks that are generic actions (e.g., review, edit, translate) and which may be performed by the system (or a user) and can be applied to any content data. For example, a workflow may be created that has two steps, e.g., “translate to Japanese” and “review”, which are then applied to a set of files. These files would flow through the workflow and be translated and then reviewed by the appropriate users (as dictated by the task). Conversely, the “exchanger” of Allen simply stores a set of differences between versions of a specific content data. No tasks or workflows are involved and all of the differences are tied to that specific content data.

Accordingly, applicants respectfully assert that Allen is not a proper basis for a 35 USC §102(b) rejection, as the reference fails to disclose each and every element of the applicants' claim 1 and claim 13. Therefore, the applicants respectfully assert that independent claims 1 and 13 are patentable over the cited reference. Further, as dependant claims 2-3 and 5-12 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 1), the applicants respectfully assert that claims 2-3 and 5-12 are also patentable over the cited reference. Additionally, as dependant claims 14-15 and 17-25 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 13), the applicants respectfully assert that claims 14-15 and 17-25 are also patentable over the cited reference.

Concerning Items 11-12 of the subject action, the Examiner rejects claims 1-4, 10-16, 20-23 and 25, under 35 USC §102(e), based on the teachings of Baxter et al. (i.e., U.S. Patent No. 6,356,903; hereinafter Baxter).

Applicants respectfully assert that Baxter fails to disclose: element (d) of applicants' claim 1, namely “wherein updating the target data content further includes initiating workflow to update the target data content”; or element (d) of applicants' claim 13, namely “wherein the processor further initiates workflow to update the target data items according to the links”.

As stated above, the applicants use of the word “workflow” concerns a systematic process for ensuring that all the manual and program (i.e., computer-controlled) steps required between content creation and final launch of one or more content objects are carried out in order, while allowing for flexibility along the way to ensure that the end result is as desired.

The Examiner fails to cite the specific passage within Baxter that was relied upon to disclose element (d) of applicants' claim 1 and claim 13, and a review of the Baxter reference fails to disclose any relevant passage(s).

Accordingly, applicants respectfully assert that Baxter is not a proper basis for a 35 USC §102(e) rejection, as the reference fails to disclose each and every element of the applicants' claim 1 and claim 13. Therefore, the applicants respectfully assert that independent claims 1 and 13 are patentable over the cited reference. Further, as dependant claims 2-3 and 5-12 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 1), the applicants respectfully assert that claims 2-3 and 5-12 are also patentable over the cited reference. Additionally, as dependant claims 14-15 and 17-25 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 13), the applicants respectfully assert that claims 14-15 and 17-25 are also patentable over the cited reference.

Concerning Items 13-14 of the subject action, the Examiner rejects claims 1, 3-7, 10-13, 15-17, 20-22, 24 and 25, under 35 USC §102(e), based on the teachings of Lakritz et al. (i.e., U.S. Patent No. 6,623,529; hereinafter Lakritz).

Applicants respectfully assert that Lakritz fails to disclose: element (d) of applicants' claim 1, namely "wherein updating the target data content further includes initiating workflow to update the target data content"; or element (d) of applicants' claim 13, namely "wherein the processor further initiates workflow to update the target data items according to the links".

As stated above, the applicants use of the word "workflow" concerns a systematic process for ensuring that all the manual and program (i.e., computer-controlled) steps required between content creation and final launch of one or more content objects are carried out in order, while allowing for flexibility along the way to ensure that the end result is as desired.

While Lakritz discloses the use of "a pipeline of translation resources", Lakritz fails to disclose a complete process (i.e., a process from creation to final launch), nor does Lakritz disclose a system having computer-controlled, program tasks or tasks that deal with translations (i.e., edit tasks or review tasks, for example). Lakritz simply discloses a hierarchy of translation resources.

Concerning Items 15-20 of the subject action, the Examiner rejects claims 1-25, under 35 USC §103(a), based on the combination of the teachings of Toh et al. (i.e., U.S. Patent No. 6,128,652; hereinafter Toh), in view of Challenger.

As stated above, the applicants claim (in currently amended claim 1):

A method of updating one or more target website data content items, comprising: (a) providing one or more links, each of which associates one or more target content items with one or more original content items; (b) storing the links in a data storage device; and accessing the links in the storage device, and (c) updating the target data content items according to the links; (d) wherein updating the target data content further includes initiating workflow to update the target data content.

Further, the applicants claim (in currently amended claim 13):

A system for updating one or more target website data content items, comprising: (a) one or more links, each of which associates one or more of the target content items with one or more original data content items; (b) a data storage device for storing the links; and (c) a processor for accessing the links in the storage, and updating the target data content items according to the links; (d) wherein the processor further initiates workflow to update the target data items according to the links.

Applicants respectfully assert that the combination of Toh and Challenger fails to disclose: element (d) of applicants' claim 1, namely "wherein updating the target data content further includes initiating workflow to update the target data content"; or element (d) of applicants' claim 13, namely "wherein the processor further initiates workflow to update the target data items according to the links".

Again, the applicants use of the word "workflow" concerns a systematic process for ensuring that all the manual and program (i.e., computer-controlled) steps required between content creation and final launch of one or more content objects are carried out in order, while allowing for flexibility along the way to ensure that the end result is as desired.

The Examiner fails to cite the specific passage within Toh and/or Challenger that the Examiner relied upon to disclose element (d) of applicants' claim 1 and claim 13, and a review of the Toh and Challenger references fails to disclose any relevant passage(s).

Accordingly, applicants respectfully assert that the combination of Toh and Challenger is not a proper basis for a 35 USC §103(a) rejection, as the combination of references fails to disclose each and every element of the applicants' claim 1 and claim 13. Therefore, the applicants respectfully assert that independent claims 1 and 13 are patentable over the cited combination of references. Further, as defendant claims 2-3 and 5-12 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 1), the applicants respectfully assert that claims 2-3 and 5-12 are also patentable over the cited combination of references. Additionally, as defendant claims 14-15 and 17-25 depend (either directly or indirectly) upon a patentable independent claim (namely independent claim 13), the applicants respectfully assert that claims 14-15 and 17-25 are also patentable over the cited combination of references.

In addition to the arguments presented above, additional arguments concerning individual dependent claims are discussed below in the following paragraphs.

Concerning dependent claims 5 and 17, the Examiner relies on the teachings of Lakritz to anticipate these claims. While Lakritz discloses an "internal format" that is used during the translation process, this "internal format" is significantly different from the three-tiered system claimed in applicants' claims 5 and 17. In the applicants' system, the middle source node is accessible by the user and is an integral part of the translation process, whereas the "internal format" of Lakritz is used solely by the system and solely for internal requirements of the system. Users of the Lakritz system are not provided access to the middle source node, the middle source node is not treated as a version of the content, and the middle source node is not a means for isolating versions.

Concerning dependent claim 6, the Examiner relies on the teachings of Lakritz to anticipate this claim. Again, while an "internal format" is mentioned, this "internal format" is used only internally in the Lakritz system and cannot be edited / updated / employed by a user of the Lakritz system. Additionally, the "internal format" of the Lakritz system has nothing to do with links and may not be applied to other content items. It is solely an internal step used to facilitate data conversion and has nothing to do with the design of the linkage system.

The use of buffer data content items is a significantly different design, when compared to the systems of Challenger, Allen, Baxter, Lakritz, and/or Toh, which greatly changes the structure of linking. Accordingly, the applicants' buffer data content items are not merely a two element link that couples two nodes of content data, but are a function that maps any arbitrary input source data to an output target data. Therefore, unlike Challenger, Allen, Baxter, Lakritz, and/or Toh, in which the links are simply pointers, the applicants' "links" are actually storing content and applying this content to the source. Technically, this is much more challenging, as it greatly increases the complexity of the content and linkage systems. Rather than a simple two-node set, the applicants' linkages must provide for storage of accompanying data and an inference engine to execute the linkages. In addition, the tasks of storing versioned content becomes significantly more challenging as content is not only modified by users and workflows, but by the links themselves. *See generally, the applicants' specification, page 6, lines 1-7.*

Concerning dependent claim 7, the Examiner relies on the teachings of Lakritz to anticipate this claim. Again, the "internal format" in Lakritz is used solely to convert between formats and is not equivalent to the applicants' buffer data content items, which (as described above) provide a more robust set of linking functionality. *See generally, the applicants' specification: page 6, lines 1-7; page 16, line 4 - page 17, line 6; and page 43, line 5 - page 44, line 2.*

Concerning dependent claims 8 and 18, the Examiner relies on the teachings of Challenger to anticipate these claims. While Challenger mentions a "copy" function in his API, as discussed above, Challenger uses a simple two element link that merely couples two nodes of content data. Again, the links of Challenger are not equivalent to the applicants' buffer data content items, which (as described above) provide a more robust set of linking functionality. *See the applicants' specification, page 17, line 22 - page 18, line 10.*

Concerning dependent claims 9 and 19, the Examiner relies on the teachings of Challenger and Allen to anticipate these claims, stating that Challenger's system "dependencies could inherit fields, such as 'version_num', from other dependencies (*See Challenger, column 19, lines 44-52 and 56-62*)."¹ However, the links in the Challenger system do not inherit "version_num" and are in no way related. Accordingly, if one link doesn't apply, the inference

engine simply chooses the value from another link. However, no new links are created based on existing links.

Allowing relations to exist between links themselves and having links be created automatically based on previous links is a novel feature of the applicants' claimed invention, as it creates a much more flexible, general, and powerful system.

Concerning the shared metadata described by Allen (*See Allen, column 8, lines 54-57*), the property inheritance described in this passage is only for properties on versions of content data. This passage never discusses properties on the links themselves. The properties on links are of a significantly different type when compared to the content data versions and play a much different role. Further, copying of properties also means that the system described in the applicants' specification discloses the creation of new links based on existing links, a novel difference. *See the applicants' specification, page 20, line 20 - page 23, line 4.*

Concerning dependent claims 11 and 21, the applicants' systems differs significantly from each prior art referenced relied upon by the examiner. Each of the prior art references discloses its own content repository with its own, proprietary file format, metadata, user interface, and application programmer interface (API). Conversely, the applicants' system uses an abstract file system that allows for linking and translation of projects between disparate repositories. This is a novel feature of the applicants' claimed invention that provides many technical advantages. For example, by using an abstract system with arbitrary characteristics, users can copy data between disparate systems. Links can be made between a relational database and an operating file system; or between a versioned repository (e.g., ClearCase, CVS, etc.) and another, completely different, versioned repository. This, in turn, allows content to be translated directly in the repository, which allows the content to remain in disparate repositories, thus allowing for easy management of disparate repositories without having to migrate content.

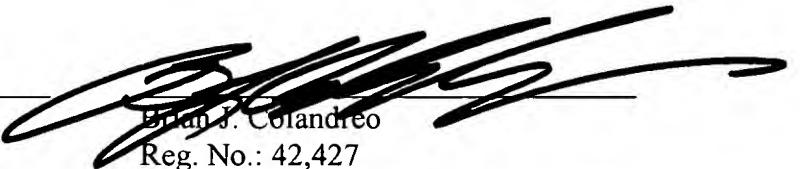
While Lakritz describes a "manager's console", this is simply a user interface to Lakritz' proprietary repository. Lakritz does not describe linking different types of storage systems or creating an abstract layer on top of the storage system.

For the reasons discussed above, the applicants respectfully assert that claims 1-3, 5-15 and 17-25 are patentable, and that the subject application is now in condition for allowance. Please apply any charges or credits to deposit account 50-1133.

Respectfully submitted,

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